

LAW OFFICES OF MICHAEL S. LAMONSOFF, PLLC

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Also Admitted in
◊ E.D.N.Y.
◊ S.D.N.Y.
◊ United States Court of Appeals 2nd Circuit
◊ NJ Federal Court
*Also admitted in New Jersey



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Faziah Gafur, Esq.
Dmitry Lapin, Esq. * ◊ ◊

ALL CORRESPONDENCE TO
NEW YORK OFFICE
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November 1, 2016

By ECF

The Honorable Katherine B. Forrest
United States District Court Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Vasquez v. The City of New York, et al.,
15 CV 9207 (KBF)

Your Honor:

This firm represents the plaintiff. I write to respectfully submit the attached redacted Declaration in further support of this firm's motion to be relieved as counsel in this case, Docket Entry No. 39, and in response to the Court's November 1, 2016 Order. Docket Entry No. 41. I previously filed this same Declaration earlier today at Docket Entry No. 42, but the redactions therein were not secure. Accordingly, I respectfully request that the Court accept the declaration attached hereto. This office thanks the Court for its time and consideration.

Respectfully submitted,
LAW OFFICES OF
MICHAEL S. LAMONSOFF, PLLC
Counsel for the Plaintiffs

/s/
By: JESSICA MASSIMI (JM-2920)
32 Old Slip, 8th Floor
New York, New York 10005
(212) 962-1020

cc: Luis Vasquez, plaintiff (by regular mail and email)
Daniel Saavedra, ACC (by ECF)

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

-----X
LUIS VASQUEZ,

Plaintiff,

-against-

15-CV-9207 (KBF)

THE CITY OF NEW YORK,
SGT. PAUL PRENDERGAST, Shield No. 3998,
Individually and in his Official Capacity,
UNDERCOVER OFFICER, Shield No. C0084,
Individually and in his Official Capacity,
UNDERCOVER OFFICER, Shield No. C0113,
Individually and in his Official Capacity,
UNDERCOVER OFFICER, Shield No. C0314,
Individually and in his Official Capacity, and
NEW YORK CITY POLICE OFFICERS "JOHN DOE" 1-3,
Individually and in their Official Capacities,
the names "JOHN DOE" being fictitious as the true names
are not presently known,

**DECLARATION OF JESSICA
MASSIMI, ESQ. IN SUPPORT
OF MOTION TO BE
RELEIVED AS COUNSEL
FOR THE PLAINTIFF**

Defendants.
-----X

1. **JESSICA MASSIMI**, pursuant to 28 U.S.C. § 1746, and subject to penalty of perjury, declares the following is true and correct:
2. I am an attorney at the Law Offices of Michael S. Lamonsoff, PLLC, attorneys for the Plaintiff, Luis Vasquez. As such, I am fully familiar with the facts and circumstances of this action.
3. This declaration is respectfully submitted *in camera* in support of my motion to be relieved as counsel for the Plaintiff, Luis Vasquez.
4. This declaration is also submitted pursuant to Your Honor's October 28, 2016 Order requiring the undersigned counsel to provide the Court with (1) an *in camera* explanation

of the issue; (2) a description of discovery taken to date; and (3) a statement from counsel that they have informed the Plaintiff that he shall be *pro se* once counsel is relieved and that the Court will not extend the deadlines.

5. The undersigned seeks to be relieved from this case because the Plaintiff has completely stopped communicating with this office and we cannot locate him.
6. He has not responded to phone calls, or attempts to reach him by letter or email in the month leading up to his deposition, which was scheduled for October 25, 2016.
7. Specifically, we have sent several emails and letters to the Plaintiff and have received no response.

8. [REDACTED]
[REDACTED]
[REDACTED]

9. [REDACTED]
[REDACTED]

10. [REDACTED]
[REDACTED]

11. [REDACTED]
[REDACTED]

12. [REDACTED]
[REDACTED]

13. [REDACTED]
[REDACTED]

14. [REDACTED]

- [REDACTED]
- [REDACTED]
15. [REDACTED]
16. [REDACTED]
[REDACTED]
[REDACTED]
17. [REDACTED]
18. [REDACTED]
[REDACTED]
[REDACTED]
19. [REDACTED]
[REDACTED]
20. [REDACTED]
[REDACTED]
21. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
22. [REDACTED]
23. [REDACTED]
24. [REDACTED]

- [REDACTED]
25. [REDACTED]
[REDACTED]
26. [REDACTED]
[REDACTED]
[REDACTED]
27. [REDACTED]
[REDACTED] [REDACTED]
[REDACTED]
28. [REDACTED]
[REDACTED]
29. [REDACTED]
[REDACTED]
[REDACTED]
30. [REDACTED]
31. [REDACTED]
32. [REDACTED]
[REDACTED]
[REDACTED]
33. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

34. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

35. [REDACTED]
[REDACTED]
[REDACTED]

36. [REDACTED]
[REDACTED]

37. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

38. This office thanks the Court for its time and consideration.

Dated: October 29, 2016

Respectfully submitted,
**LAW OFFICES OF
MICHAEL S. LAMONSOFF, PLLC**
Counsel for the Plaintiffs

/s/
By: JESSICA MASSIMI (JM-2920)
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